

EXHIBIT I

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

13 CISCO SYSTEMS, INC.,

Case No. 5-14-CV-05344-BLF

14 Plaintiff,

**DEFENDANT ARISTA NETWORKS,
INC.'S RESPONSES TO PLAINTIFF
CISCO SYSTEM INC.'S FIRST SET OF
INTERROGATORIES
(NOS. 1-13)**

15 v.

16 ARISTA NETWORKS, INC.,

17 Defendant.

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1 only recently begun, and Arista's investigation in this matter is ongoing.

2 Subject to and without waiving the foregoing general and specific objections, Arista
 3 responds as follows:

4 The following versions of EOS have been developed by Arista.: 4.14.5.1-SSU; 4.15.0;
 5 4.14.5-SSU; 4.12.10; 4.13.11; 4.14.4.1; 4.14.5FX; 4.14.6; 4.13.10; 4.13.9.1; 4.14.5; 4.11.11;
 6 4.14.4; 4.13.7.3; 4.12.9; 4.13.9; 4.14.3; 4.13.8; 4.14.2; 4.11.10; 4.14.1; 4.13.7.2; 4.12.8.1; 4.14.0;
 7 4.13.7.1; 4.13.7; 4.13.3.4; 4.13.3-l3scale; 4.13.5.1; 4.12.8; 4.11.9; 4.13.6; 4.12.7.1; 4.11.8.2;
 8 4.10.8.1; 4.9.11; 4.8.12; 4.13.4.1; 4.13.3.1; 4.13.5; 4.10.8; 4.13.4; 4.11.8.1; 4.12.7; 4.11.8; 4.13.3;
 9 4.13.2; 4.9.10; 4.12.6; 4.13.1; 4.13.0; 4.11.7.1; 4.12.5.1; 4.11.7; 4.10.7; 4.12.5; 4.12.0.5; 4.12.4.1;
 10 4.12.4; 4.8.11; 4.11.6; 4.12.3.1; 4.12.2.1; 4.9.9; 4.10.6; 4.12.3; 4.12.2; 4.11.5.1; 4.11.5; 4.11.4.3;
 11 4.12.1; 4.9.8; 4.11.4.2; 4.10.5; 4.12.0; 4.11.4; 4.11.3; 4.12.0-7500-EFT; 4.10.4.0.2; 4.11.2.2;
 12 4.10.4-OpenFlow; 4.11.2.1; 4.10.4.0.1; 4.11.2; 4.8.10; 4.10.4; 4.9.7; 4.11.1; 4.11.0; 4.8.9;
 13 4.10.0.2-7150; 4.10.3; 4.9.6; 4.10.0.1-7150; 4.10.0-7150; 4.10.2; 4.10.1-SSO; 4.8.8 4.9.5; 4.10.1;
 14 4.8.7.1; 4.8.7; 4.10.0; 4.10.0-SSO; 5.0.0; 4.9.4; 4.9.3.2; 4.9.3.1; 4.9.3; 4.8.6; 4.9.2; 4.8.5; 4.8.4;
 15 4.9.1; 4.9.0; 4.8.3; 4.8.2.1; 4.8.2; 4.7.8; 4.7.7.1; 4.8.1; 4.7.7; 4.7.6; 4.7.5; 4.7.3.1; 4.7.4; 4.7.3;
 16 4.6.4; 4.7.0; 4.6.3; 4.6.2; 4.6.1; 4.6.0; 4.5.5; 4.5.4; 4.5.3; 4.5.2; 4.5.1; 4.4.3; 4.5.0; 4.4.2; 4.4.0;
 17 4.3.2; 4.3.1; 4.3.0; 4.2.3; 4.2.2; 4.2.1; 4.2.0; 4.1.0; 4.0.0; 3.1.0; 3.0.0; 2.3.0; 2.2.0; 2.1.0; 2.0.5;
 18 2.0.4; 2.0.0; 1.1.0; 1.0.0.

19 Arista is willing to meet and confer with Cisco about what additional information, if any,
 20 is appropriate to provide in response to a narrowly tailored interrogatory relating to this subject
 21 matter.

22 **INTERROGATORY NO. 3:**

23 For each quarter dating back to October 2004, for each Accused Product, state (i) the total
 24 number of units sold, (ii) the gross revenue (in U.S. dollars), (iii) the net profits (in U.S. dollars),
 25 (iv) the profit margins (in U.S. dollars), and (v) the costs (in U.S. dollars) associated with each
 26 Accused Product.

27 **RESPONSE TO INTERROGATORY NO. 3:**

28 Arista incorporates its General Objections above as though set forth in this response. The

1 request is also overbroad and unduly burdensome because it seeks information about “each
 2 Accused Product,” where “Accused Product” is defined as “any Product designed, manufactured,
 3 marketed, offered for sale, sold, and/or imported by, at the direction of, under the control of,
 4 and/or subject to contract or agreement with Arista.” Arista objects to this interrogatory to the
 5 extent it seeks information that is already in the possession, custody, or control of Cisco, or that is
 6 publicly available. Arista objects to this interrogatory as vague, ambiguous, overbroad, unduly
 7 burdensome and not reasonably calculated to lead to the discovery of admissible information.
 8 Arista further objects to this interrogatory as premature given that discovery in this action has
 9 only recently begun, and Arista’s investigation in this matter is ongoing.

10 Subject to and without waiving the foregoing general and specific objections, Arista
 11 responds as follows:

12 Arista does not keep information in the form requested by this interrogatory in the
 13 ordinary course of business. Pursuant to Federal Rule of Civil Procedure 33(d), Arista will
 14 supplement this response to identify the Bates numbers of documents containing information
 15 relevant to this interrogatory that Arista maintains in the ordinary course of business.

16 **INTERROGATORY NO. 4:**

17 Identify the date and circumstances under which You first became aware of the Asserted
 18 Patents or the applications that matured into the Asserted Patents, and identify each Entity who
 19 became aware of the Asserted Patents at that time.

20 **RESPONSE TO INTERROGATORY NO. 4:**

21 Arista incorporates its General Objections above as though set forth in this response.
 22 Arista objects to this interrogatory to the extent it seeks information that is already in the
 23 possession, custody, or control of Cisco, or that is publicly available. Arista objects to this
 24 interrogatory as vague, ambiguous, overbroad, unduly burdensome and not reasonably calculated
 25 to lead to the discovery of admissible information. The request is vague and ambiguous in its use
 26 of the phrase “circumstances.” Arista objects to this interrogatory to the extent it calls for, or may
 27 be construed as calling for, information protected from discovery by the attorney-client privilege,
 28 work product doctrine, or any other common law or statutory privilege or protection. Arista further

1 PROOF OF SERVICE
23 I am employed in the City and County of San Francisco, State of California in the office of a
4 member of the bar of this court at whose direction the following service was made. I am over the
age of eighteen years and not a party to the within action. My business address is Keker & Van
Nest LLP, 633 Battery Street, San Francisco, CA 94111-1809.5 On April 30, 2015, I served the following document(s):
67 • **DEFENDANT ARISTA NETWORKS, INC.'S RESPONSES TO PLAINTIFF
CISCO SYSTEM INC.'S FIRST SET OF INTERROGATORIES (NOS. 1-13)**8 by **E-MAIL VIA PDF FILE**, by transmitting on this date via e-mail a true and correct copy
9 scanned into an electronic file in Adobe "pdf" format. The transmission was reported as
complete and without error.10 Sean Sang-Chul Pak
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1 Executed on April 30, 2015, at San Francisco, California.

2 I declare under penalty of perjury under the laws of the State of California that the above is true
3 and correct.

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5 /s/ Alisa Thompson
6 Alisa Thompson
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